

FAX
Cover Sheet

Great Falls Trail Bike Riders Assn

"Creating a Positive Future for Off Highway Vehicle Recreation"

To: *Objection Reviewing Office* From: *MTVRA + GFTBRA*
Fax: *406-329-3411* Pages: *TOTAL 8 PAGES*
Phone: Date: *MAY 12, 2014*
Re: *Objection: DRAFT ROD for Blackfoot Travel Plan*

☒ Urgent ☐ For Review ☐ Please Comment ☒ Please Reply ☐ Please Recycle

Comments:

following - 7 pages

Please confirm receipt.

*Montana Trail Vehicle Riders Assn +
Great Falls Trail Bike Riders Assn
+ 18 individual objectors.*

Objection Reviewing Officer
USDA Forest Service Northern Region
P.O. Box 7669,
Missoula, MT 59807
appeals-northern-regional-office@fs.fed.us

May 12, 2014

Re: Objection for the Draft Record of Decisions for the Blackfoot Travel Plan and Wildlife Security Plans dated March 2014

Dear Sir/Madam,

Pursuant to 36 CFR 218 subparts A and B we find it necessary to file objections to selected items in the Draft Record of Decisions for the Blackfoot Travel Plan and Wildlife Security Plans dated March 2014.

The Montana Trail Vehicle Riders Association (MTVRA) represents a mix of single, family, and business members as well as local OHV clubs and associations supporting responsible OHV use. MTVRA believes in fair, balanced and equitable solutions to the ongoing loss of the OHV opportunities. Our members live and work in Montana and recreate on public land on a regular basis. MTVRA is recognized by State and Federal agencies as the state association representing off highway recreationists in Montana.

The Great Falls Trail Bike Riders Association (GFTBRA) is a MTVRA charter club and represents the interests of motorcycle riders, ATV riders and snowmobilers recreating on the public lands throughout Montana.

MTVRA and GFTBRA actively works to educate the public about good ethics and the responsible use of motorized vehicles on public and private lands. We believe in shared, multiple-use of public lands, with a reasonable balance between the protection of the natural resources and maintaining a variety of opportunities currently available to the people of Montana. We participate in local and state sponsored trail maintenance projects and have served as willing and committed partners to the multiple Forest Service Districts. The families and diverse groups of visitors to public lands are one of Montana's most valuable resources and thus deserve recognition and consideration.

MTVRA & GFTBRA appreciate the opportunity to participate in the Blackfoot Travel Plan. While we would like to see single track trails on the north side of Highway 200, we realize the challenges faced with the wildlife issues. We support and appreciate the proposals for the Stonewall trail, the Lincoln Gulch trails, 1st, 2nd, & 3rd Gulch plans, as well as the trail possibilities in the old Mike Horse Mine area.

Our associations and members are great volunteers, keeping trails open for all users. The funding constraints faced by the land managers make it imperative that the trail users volunteer to help make the trail system sustainable and create an enjoyable recreational opportunity. Our volunteer work with the Helena National Forest and Lewis & Clark National Forest is well documented.

The signatures of the objectors joining in this statement are included at the end of this objection.

Objection point #1. Comments from all objectors support single track motorcycle trails.

We strongly object to the elimination of single track motorcycle trails in the planning area. The closure of the section of the Continental Divide Trail #1872, Stemple to Fletcher along with the decommissioning of trails 487(north from intersection on Trail #467 to Poorman Creek Road) and U416 & U414, eliminate single track trails that have been used historically by motorcycle riders from Great Falls, Helena, as well as the cabin owners located in the Stemple Pass area.

The cumulative effect of these closures along with the loss of historic single track trails over the past 30+ years on the Helena National Forest have eliminated legitimate motorcycle trails as identified in the 3-State OHV ROD & FEIS. The Blackfoot Travel Plan Draft ROD acknowledges the elimination of single track motorized trails with the statement *"While alternative 4 does not provide any specific single-track opportunities for motorcycles, motorcycles could continue to use any trail open to vehicles 50 inches or less."*

Alternative 4 creates a new 'special use' trail for mountain bicycles while eliminating motorcycle single track trails. One of the primary purposes for the Blackfoot Travel Plan is to provide a variety of recreation opportunities. The focus of travel planning is not to create trails designated for 'exclusive' access by user type.

Requested remedies, Objection point #1:

Designate trail U414 from road 1838 to road 1825E1 as a motorized single track trail. This would remedy the total elimination of single track trails, provide a quality motorcycle experience while dispersing motorized use. Members of the MTVRA have committed to adopting this trail and perform maintenance and any required work on this trail to have a single track trail open to motorcycles. This would address the private property owners' comments about the historic use of this trail.

Designate trail U416 beginning on private property and connecting to U414 would be added to the Associations' trail adoption and commitment stated for trail U414.

Designate identified decommissioned section of trail #487 from the junction with #467 north to the Poorman Creek road. This would allow access for the cabin owners, provide for a drop off point on trail #467 when traveling in either direction. It would disperse travel from #467.

Designate the mountain bike trail system as a combined mountain bike/motorcycle trail system. The level of use will not be a conflict. This approach has worked well in many other places.

While these trails would be single track multiple use, the non-motorized trail user with exclusive expectations would continue to have other options available to them in the general area.

The addition of these single track motorized trails would address the public safety concerns stated in the Draft ROD, page 46 & 47 and the management of perceived conflicts, page 48.

Objection Point #2. Comments from objectors support designation of trail #401 & trail #404 as 'Motorized trail, vehicles 50 inches and under'.

Dalton to Ogden trails make a connector allowing for a shorter high quality loop opportunity complimenting than the longer Helmsville Gould trail. These trails have been part of the motorized system south of Highway 200 for many years. When loop opportunities are incorporated into a trail system, traffic is dispersed.

Requested remedy, Objection point #2:

Designate trails 401 & 404 as 'Motorized trail, 50 inches and under'. Only a small segment of trail #401 is close to the elk security area identified in the FEIS, Chapter 3, maps showing the Ogden Mountain elk security area.

Objection Point #3: Comments from objectors all find a problem with the closure dates.

We believe the closure dates should be October 15 to May 15 yearly with elk calving area restrictions only where the actual calving area is identified.

The closure dates as listed on the Draft ROD map is inconsistent and troublesome.

The Helmsville Gould trail shown as motorized, closed 10/15; it is also identified as a mountain bicycle route. The Stemple to Fletcher trail is identified as non-motorized, open year long, and a mountain bicycle route with no closures.

"In contrast to horseback riding, elk travel time during mountain bike riding was above that of controls for each year and was consistent among years. Thus, elk showed no evidence of habituation to mountain bike riding. Similarly, elk travel time in response to hiking suggesting a similar response by elk to each hiking disturbance (i.e. no habituation)." Journal of Wildlife Management. L.M. Naylor, Michael J Wisdom, Robert G. Anthony

The elk study information from the Starkcy Project findings (Wisdom et al.2004b) are used as a reference in the draft FEIS as well as wildlife documents. The papers associated with this study are interesting with many results to consider. Many times it appears only the information fitting the desired outcome is used or noted.

"Despite the wealth of information about how roads and motorized traffic affect elk and their habitats, gaps in our knowledge remain. For example, although we know that elk response to roads generally varies depending on the level and type of motorized traffic, we have little knowledge about the precise levels of such disturbance that elicit a response and the duration of that response. (A.A. Ager, 2003, Wisdom et al. 2004b)."

"More than half of 802 road closures inventoried on national forests in Idaho, Montana, Washington and Wyoming were found to be ineffective, even after accounting for administrative use (Havlick 2002)."

"Our results may also change if elk eventually become habituated to some or all of the off-road activities." Effects of Off-road Recreation on Mule Deer & Elk, Transactions of the 69th North American Wildlife and Natural Resources Conference

Areas for the studies tend to be based on 'roads', with the Starkey project in a controlled area with no history of travel on the trails. With a long history of motorized use on the trails in the planning area, the game has become habituated. There are no studies available on areas with a history of motorized trail use.

The recreational OHV enthusiast riding time frame is limited because of hunter pressure for the complete closure of their favorite hunting area. Yet many hunters consider their ATV a part of their elk hunting gear. The Rocky Mountain Elk Foundation publication "Bugle" noted in 2006 half of their members owned an ATV and considered it a part of their elk hunting gear. It would follow that many of these hunters will use their ATV on the trails where they have always hunted. The enforcement problems abound.

Reasonable seasonal closures for hunting season is a far more reasonable alternative than total motorized closures to address the issue of 'fair chase'.

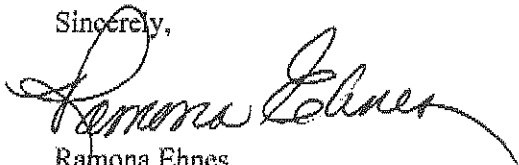
Hunting district #293 elk numbers are below the objective. As recognized in the FEIS, the wolf numbers are high in that district. We believe this has been a major contributing factor to the reduced number of elk. Five years ago there were 375 cow permits issued for the district and only 25 issued in 2012. We do not believe the cycle of changing elk numbers is a reason to close the trails to motorized travel.

Requested remedy; Objection point 3.

Adjust the closing dates 10/15 to 5/15. Examine the trail closure dates for non-motorized trails.

Thank you for your time and attention to our concerns.

Sincerely,



Ramona Ehnes
Secretary/Treasurer for
Montana Trail Vehicle Riders Association
Great Falls Trail Bike Riders Association
PO Box 2884
Great Falls, MT 59403

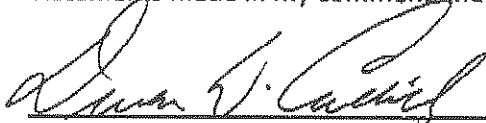
406-454-9190
406-781-0967 Cell

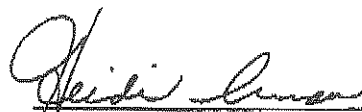
Attachment to:

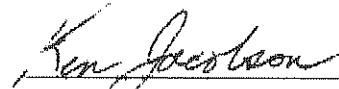
Objection for the Draft Record of Decisions for the Blackfoot Travel Plan and Wildlife Security Plans dated March 2014

Having submitted timely, specific written comments during the comment period, the signature below authorizes Ramona Ehnes, Secretary/Treasurer of the Montana Trail Vehicle Riders Association and the Great Falls Trail Bike Riders to represent me as lead objector on the above plans.


The Objection(s) and remedy(s) stated in this document are directly linked to specific statements made in my comment and the above plan.

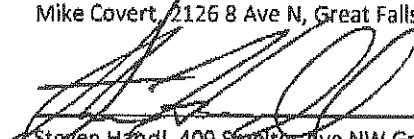

Duane Cassidy, 361 3 Ave S. Great Falls MT 59405


Heidi Annau, 701 55 Ave S. Great Falls, MT 59405


Ken Jacobson, 1116 Ave C NW, Great Falls, MT 59404


Mike Covert, 2126 8 Ave N, Great Falls, MT 59401


Patrick Brennan, 815 21 St NW, Great Falls, MT 59404


Steven Handl, 409 Smelter Ave NW Great Falls 59404


Theron Burch, 15 Cherokee Drive, Great Falls, MT 59404


John Streich, 401 36 Ave NE, Great Falls, MT 59404


Brian Felsted, 732 32 Ave NE, Great Falls, MT 59404


Bruce Turner, 119 Brandywine Ln, Great Falls 59404


Cathy Covert, 2205 8 Ave N, Great Falls, MT 59401


Dave Covert, 2205 8 Ave N, Great Falls, MT 59401


Joe Erickson, 2712 2 Ave N, Great Falls, MT 59401


Mark Klemencic, 1516 18 Ave S, Great Falls 59405

Attachment to:

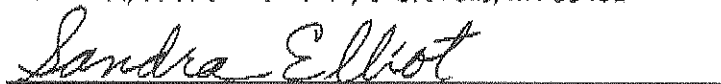
Objection for the Draft Record of Decisions for the Blackfoot Travel Plan and Wildlife Security Plans dated March 2014

Having submitted timely, specific written comments during the comment period, the signature below authorizes Ramona Ehnes, Secretary/Treasurer of the Montana Trail Vehicle Riders Association and the Great Falls Trail Bike Riders to represent me as lead objector on the above plans.

The Objection(s) and remedy(s) stated in this document are directly linked to specific statements made in my comment and the above plan.



Alan Elliot, 35205 Ave North, Great Falls, MT 59401



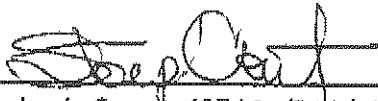
Sandra Elliot, 3520 5 Ave North, Great Falls, MT 59401

Attachment to:

Objection for the Draft Record of Decisions for the Blackfoot Travel Plan and Wildlife Security Plans dated March 2014

Having submitted timely, specific written comments during the comment period, the signature below authorizes Ramona Ehnes, Secretary/Treasurer of the Montana Trail Vehicle Riders Association and the Great Falls Trail Bike Riders to represent me as lead objector on the above plans.

The Objection(s) and remedy(s) stated in this document are directly linked to specific statements made in my comment and the above plan.



Stephanie Covert, 427 MacTavish Lane, Belgrade, MT 59714



Thomas Covert, 427 MacTavish Lane, Belgrade, MT 59714